apply these lotions or emulsions to the topsheet of Roe to reduce skin irritation and prevent diaper rash.

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Applicants respectfully traverse.

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Applicants wish to direct the Examiner's attention to the definition of IC_{50} on Page 7, second paragraph of the present application. As used herein, the term " IC_{50} " refers to the <u>concentration</u> of an inhibitor to reduce the rate of substrate cleavage by a protease by 50%, as measured by the test described in the application. Therefore, the IC_{50} value is a <u>concentration</u>, rather than an inherent property, of the protease inhibitor to achieve a desired effect (i.e., a 50% reduction in substrate cleavage). It is further disclosed that such effect results in reduction or prevention of the initial insult by a fecal protease to the stratum corneum (Page 8, Lines 23-26).

Applicants respectfully point out that the Examiner erred in stating (a) IC_{50} is an inherent property and (b) Kasahara discloses all claimed IC_{50} values. In fact, both references are silent regarding the concentration of any inhibitor. Thus, there is noteaching or suggestion in the cited references of the specific concentration of the protease inhibitor needed to achieve a 50% reduction in substrate cleavage.

Moreover, the Roe reference merely teaches benefits such as BM cleaning and a long-lasting, lubricious skin feel (Col. 3, Lines 50-60) and the Kasahara reference merely teaches benefits such as excellent cleaning power and reduced skin irritation (Page 4, third full paragraph). To arrive at the present invention, one of ordinary skill in the art must first identify the percentage reduction in substrate cleavage needed to provide the desired benefit to the stratum corneum. Then, one must figure out the concentration of protease inhibitor for achieving that specific result. One must accomplish both tasks without any guidance from the references.

Based on the foregoing, Applicants submit that the 103 rejection cannot be sustained. Applicants respectfully request that the Examiner reconsider and withdraw the 103 rejection.

CONCLUSION

The above represents a complete response to the Office Action dated July 13, 2001. Reconsideration, withdrawal of rejection and allowance are respectfully requested.

> Respectfully submitted, For: Rourke et al.

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